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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning.	))))	Rulemaking 04-04-003 (Filed April 1, 2004)
Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.	)))))	Rulemaking 04-04-025 (Filed April 22, 2004)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN

FRANK J. COOLEY
BERJ K. PARSEGHIAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3102
Facsimile: (626) 302-1904
E-mail: Berj.Parseghian@sce.com

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Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits these comments on the Proposed Decision of Administrative Law Judge Halligan on Future Policy and Pricing for Qualifying Facilities (QFs), issued on April 24, 2007 (Proposed Decision).

Overall, the Proposed Decision provides a thoughtful and well-reasoned approach to the many issues raised in this proceeding. In particular, the Proposed Decision recognizes the substantial merit in relying on markets to establish avoided cost pricing, as evidenced most clearly by the Proposed Decision's determination to adopt a market-based methodology for determining the short-run avoided cost (SRAC) of energy. The Proposed Decision, however, has several significant flaws which, if left uncorrected, will produce above-market payments in excess of avoided cost and impose additional – and unnecessary – long-term contracting burdens on investor owned utility (IOU) bundled service customers that will not be shared by customers of other retail providers. The resulting inequity would be further exacerbated should the Commission pursue a future policy of expanded competitive retail choice.

As discussed below, mandatory long-term standard offer contracts are not required by the Public Utility Regulatory Policies Act of 1978[1] (PURPA). The imposition of mandatory long-term standard offer contracts will skew the existing retail market, will burden utility customers with a disproportionate share of costs, and may produce stranded costs. If the Commission sees broader societal benefits in these contracts, it should require that the costs be borne by *all* customers – not by just IOU bundled service customers.

Second, the Proposed Decision proposes to adopt methodologies and values that will produce energy and capacity prices in excess of avoided cost. With respect to energy, the Proposed Decision inappropriately double-counts the cost associated with variable operations and maintenance (O&M). The Proposed Decision also adopts excessive values, not supported by the record, for both "as-available" capacity and firm capacity. In the event that the Commission chooses to adopt long-term contracting obligations notwithstanding the fundamental policy conflict inherent in such a choice, it is essential that the Commission correct the errors in avoided cost pricing in order to avoid stranded costs.

Third, it is critical that the Commission adopt the modifications to the SRAC energy pricing mechanism in the Proposed Decision retroactively. The same record that demonstrates the need to make prospective changes in the SRAC energy pricing methodology amply demonstrates that energy payments to QFs have exceeded avoided cost for many years. Therefore, SCE respectfully requests that the Commission adopt the Proposed Decision with the modifications described herein.

I.

NEW STANDARD OFFER CONTRACTS ARE INCONSISTENT WITH STATE AND FEDERAL POLICY AND SHOULD BE REJECTED

As the Proposed Decision itself recognizes, standard offer contracts are *not* required by PURPA, nor are must-take obligations of any particular duration. Mandating new long-term standard offer contracts for new and existing QFs will cause IOU bundled service customers to bear additional costs, such as debt equivalence, without imposing such an obligation on customers of other retail providers. There is no reason why IOU bundled service customers

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[1] Pub.L. No. 95-617 (Nov. 9, 1978), *codified in part at* 16 U.S.C. § 824a-3 *et seq.*

should bear long-term contract costs for existing QF projects, which have already benefited from high payment streams over many years. To the extent the Commission is attempting to encourage the development of new QF generation resources through long-term contracts in order to enhance system-wide reliability, all customers, not just IOU bundled service customers, should bear such costs.

Moreover, imposing long-term contracting requirements on some but not all customers is fundamentally at odds with the potential reinstatement of "direct access" competitive retail choice being considered by the Commission and scheduled to resume once the current suspension of customer choice ends. Nevertheless, the Proposed Decision would impose long-term contracting obligations solely on utilities at a time when the Commission is considering having the utilities compete with other load serving entities who are not similarly burdened. The Commission has the discretion to avoid implementing PURPA in a manner that undermines fair cost obligations for all customers and potential changes to California's retail energy market. As history has proven, failing to confront this issue head-on now may prove disastrous.

Prior to discussing the dramatic failure of the standard offer program of the 1980s and suspending the availability of the last remaining standard offer contract prior to deregulation, Decision (D.)96-10-036 begins by explaining:

> The utilities assert a need to restructure their long-term power purchase obligations for a more competitive marketplace, one brought about by Rulemaking 94-04-031/Investigation (I.) 94-04-032 (the electric industry restructuring proceeding), the Energy Policy Act of 1992 (EPAct), and the possible repeal of the Public Utility Regulatory Policies Act of 1978 (PURPA).[2]

The utilities find themselves in a similar position today. The Commission is presently considering instituting a rulemaking "as to whether, when, or how direct access should be restored."[3] In addition, the Energy Policy Act of 2005 added Section 210(m) to PURPA, which "provides for termination of an electric utility's obligation to purchase energy and capacity from [QFs], if FERC finds that certain market conditions are met."[4] The California Independent System Operator's (CAISO) Market Redesign and Technology Upgrade (MRTU), which is scheduled for implementation in early 2008, is expected to satisfy those market conditions, and

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[2] D.96-10-036, 68 Cal. P.U.C. 2d 434, 439 (1996).

[3] *See* Petition No. 06-12-002.

SCE intends to file a petition seeking relief from the PURPA mandatory purchase obligation upon implementation of MRTU.

The Proposed Decision's adoption of five- and ten-year standard offer contracts is inconsistent with these policies and threatens to repeat mistakes of the past. D.96-10-036 explains how the standard offer program resulted in substantial and continuing overpayments for QF capacity, created an enormous burden on ratepayers, and impeded the development of competitive markets:

> [I]n our early efforts to promote QF development, we made available standard offers that were not contingent upon the utility's voluntary offer: standard offers were effectuated through regulatory order of their availability, and the voluntary acceptance of that offer by a QF formed the agreement. This approach failed dramatically and we suspended, without hearings, standard offer 2 and interim standard offer 4 for that reason. The combination of standard offer prices and their ready availability led to more dramatic subscription than the Commission anticipated. Because a basic tenant of PURPA is the indifference of ratepayers of the purchase price, relative to utility self-generation or other purchases (18 Code of Federal Regulations (CFR) Section 292.101(b) (6)), the Commission has previously suspended the availability of standard offers. ***Unfortunately, by the time the Commission acted to suspend standard offer 2 and interim standard offer 4, many agreements the Commission chose to honor had been signed by QF developers, and those agreements are now a significant (but not the only) contributor to California's high rate problem and corresponding regional competitive disadvantage to California business. Existing QF agreements are expected to contribute billions of dollars to the competitive transition charge (CTC) that must be paid by ratepayers in order to move to a more competitive generation market.***[5]

The Commission should heed this warning and decline to adopt new standard offer contracts at this time. Specific modifications to the Proposed Decision that decline to adopt new standard offer contracts are set forth in **Attachment A** hereto.

To the extent the Commission persists in adopting standard offer contracts, the Commission should make the modifications discussed below and set forth in **Attachment B** hereto. Specifically, the benefits and costs of new QF obligations should be allocated to all customers to avoid imposing potential stranded costs solely on utility bundled service customers.

Continued from the previous page

4 *Notice of Proposed Rulemaking,* 71 Fed. Reg. 4532 (Jan. 27, 2006); *see* 16 U.S.C. § 824a-3(m).

5 D.96-10-036, 68 Cal. P.U.C. 2d at 442-43 (*emphasis added*).

To the extent the Commission is ordering these new QF contract obligations for system reliability reasons, Public Utilities Code section 380(g) authorizes the Commission to allocate the costs to all customers.[6] In addition, section 380(b) expressly authorizes the Commission to "[e]quitably allocate the cost of generating capacity and prevent shifting of costs between customer classes."[7]

The Proposed Decision should also be modified to establish an eligibility window that will limit the potential for another QF "gold rush." Because the availability of the standard offer contracts described in the Proposed Decision is likely to be limited as a result of the anticipated suspension of SCE's PURPA purchase obligation, there is a significant risk that existing and new QFs will seek to "grandfather" their opportunity for long-term contracts immediately. Therefore, any new contracts should only be available to existing QFs with contracts that expire in a rolling 24-month window and to new QFs that will come online within a rolling 36-month window. In addition, these contacts should cease to be available as of the effective date of a FERC order terminating SCE's PURPA purchase obligation. Finally, the Proposed Decision should be modified to expressly state that all new or renewed QF contracts must comply with the greenhouse gas emissions performance standard ("EPS") to the extent required by Senate Bill 1368 and D.07-01-039.

II.

THE QF ENERGY AND CAPACITY PRICES ADOPTED IN THE PROPOSED DECISION EXCEED SCE'S AVOIDED COST

The Proposed Decision adopts a Market Index Formula (MIF) for SRAC energy based on a methodology proposed by SCE,[8] an "as-available" capacity price of $60.84/kW-yr for 2007 based on the fixed charge associated with a combustion turbine less ancillary services value,[9] and a firm capacity price of $104/kW-yr "based on the market price referent (MPR) capacity cost

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[6] *See* Cal. Pub. Util. Code § 380(g).
[7] Cal. Pub. Util. Code § 380(b)(2); *see also* Cal. Pub. Util. Code § 380(h)(4).
[8] *See* Proposed Decision at 61-62, Finding of Fact No. 17.
[9] *See id.* at 85, 90.

adopted in Resolution E-4049 . . . ."[10] Each of these payment methodologies contains flaws which result in payments that exceed SCE's avoided cost. Failure to deduct variable O&M from the power price in the MIF results in a double-payment for variable O&M. The as-available capacity price exceeds SCE's avoided cost because "as-available" capacity value is already included in the SRAC energy price and the Proposed Decision fails to properly deduct ancillary services value. Finally, the firm capacity price exceeds SCE's avoided cost because it fails to deduct energy-related capital costs and residual value. As discussed more fully below, the Proposed Decision should be modified to correct each of these flaws and to yield QF energy and capacity payments that are consistent with SCE's avoided cost.

A. THE SRAC ENERGY FORMULA ADOPTED IN THE PROPOSED DECISION YIELDS PAYMENTS THAT EXCEED SCE'S AVOIDED COST

1. The SRAC Energy Formula Adopted In The Proposed Decision Yields Payments That Exceed SCE's Avoided Cost Because It Double-Pays For Variable O&M

The Proposed Decision adopts a MIF for SRAC that is based on a methodology proposed by SCE.[11] The MIF uses a twelve-month rolling average of historical day-ahead market prices to calculate a market heat rate, which is multiplied by a burnertip gas price to yield SRAC.[12] The MIF is calculated as proposed by SCE, "with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation."[13] However, the Proposed Decision's failure to deduct an O&M value results in an SRAC price that exceeds avoided cost.

The day-ahead market prices that are used to calculate the market heat rate already include variable O&M.[14] However, the MIF pays for variable O&M through a separate O&M

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[10] *Id.* at 85-86.
[11] *See id.* at 61-62, Finding of Fact No. 17.
[12] *See id.*
[13] *See id.* at Table 4.
[14] *See* TURN Rebuttal Testimony, Ex. 150 at 4.

adder.[15] Therefore, O&M must be subtracted from the power price prior to calculating the market heat rate in order to provide a heat rate that does not include variable O&M. This is why the methodology proposed by SCE subtracts variable O&M to calculate an implicit market heat rate net of variable O&M.[16] CCC witness Beach employed a similar methodology in his heat rate calculation based on forward prices.[17]

The Proposed Decision's failure to "deduct an O&M value from the power price in the heat rate calculation"[18] results in a double-payment for variable O&M.[19] A payment for variable O&M is included in the market heat rate, and a separate payment for variable O&M is included in the O&M adder.[20] Consequently, the MIF yields energy payments that exceed SCE's avoided cost. In order to remedy this double-payment, the Proposed Decision should be modified to deduct variable O&M from the power price in the market heat rate calculation, as proposed by SCE.

2. <u>The Proposed Decision Should Not Change SCE's TOU Factors</u>

The Proposed Decision modifies the time-of-use periods and factors that are used to convert annual or seasonal prices into time-period specific prices. Specifically, the Proposed Decision "require[s] the IOUs to include the TOU/TOD factors and periods utilized as part of their most recent RFOs."[21] No party requested a change to SCE's TOU factors,[22] and the TOU factors used in SCE's RFOs are not appropriate for time-differentiating QF payments.

SCE's QF payments are currently time-differentiated using separate factors for energy payments and capacity payments. The TOU factors used in SCE's RFOs are not appropriate for

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[15] *See* Proposed Decision at Table 4.
[16] *See* SCE Opening Testimony, Ex. 1 at 62-64.
[17] *See* CCC/Beach, Tr. Vol. 28 at 3906:2-6, 3914:18-21; CCC Opening Testimony, Ex. 102 at Table 7.
[18] *See id.* at Table 4.
[19] *See* TURN Rebuttal Testimony, Ex. 150 at 4 ("Avoided O&M costs are already part of the market prices which are analyzed by IEP witness Monsen, and are therefore double-counted in his proposal.").
[20] *See id.*
[21] Proposed Decision at 68.
[22] *See, e.g.,* CCC Opening Testimony, Ex. 102 at 54:17, 54:24-25 ("Edison's existing TOU factors may not need to be changed. . . . Edison's existing TOU factors already are relatively 'peaky' . . . .").

time-differentiating QF payments because they do not have separate factors for energy payments and capacity payments. The TOU factors used in SCE's renewables solicitations are "all-in" factors that are applied to the combined energy and capacity payments made to renewable resources. They are too peaked to apply to separate energy payments. The price shape factors used in SCE's all-source RFOs are also not appropriate for time-differentiating QF payments. SCE's all-source RFOs do not use fixed TOU factors but, instead, use price shapes that vary based on the heat rate of the unit. As a result, they cannot be applied to QF energy and capacity payments.

The TOU factors used in SCE's RFOs are not appropriate for time-differentiating QF payments, and no party has requested a change to SCE's TOU factors. Therefore, the Proposed Decision should be modified to direct SCE to continue to use its current TOU factors for time-differentiating QF payments.

3. <u>**The Proposed Decision Should Be Modified To Allow Monthly Updates Of Intrastate Transportation Rates For Natural Gas**</u>

The Proposed Decision adopts a burnertip gas price for use in calculating SRAC. The Proposed Decision states that it will allow "the [] utilities to *annually* update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary."[23] However, SoCalGas intrastate transportation rates are currently updated on a *monthly* basis. The Proposed Decision should be modified to allow the utilities to update the intrastate transportation rate on a monthly basis.

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[23] Proposed Decision at 66 (*emphasis added*).

B. THE "AS-AVAILABLE" AND FIRM CAPACITY PRICES ADOPTED IN THE PROPOSED DECISION EXCEED SCE'S AVOIDED COST

1. The "As-Available" Capacity Price Adopted in the Proposed Decision Exceeds SCE's Avoided Cost Because "As-Available" Capacity Value Is Already Included In The SRAC Energy Price And The Proposed Decision Fails to Properly Deduct Ancillary Services Value

The Proposed Decision adopts an "as-available" capacity price of $60.84/kW-yr for 2007 based on the fixed charge associated with a combustion turbine less ancillary services value.[24] As explained in SCE's opening brief, it is inappropriate to adopt a separate "as-available" capacity value for QFs that do not deliver firm capacity.[25] SCE's testimony in this proceeding establishes that the "all-in" SP-15 day-ahead market prices used in the SRAC methodology adopted by the Proposed Decision already include any value placed by the market on day-ahead firmness.[26] Thus, these "all-in" prices include any capacity value attributable to "as-available" deliveries, and the separate "as-available" capacity payment adopted by the Proposed Decision overpays for capacity.[27] The Proposed Decision should be modified to eliminate the separate "as-available" capacity payment.

To the extent the Commission retains the separate "as-available" capacity payment, the Proposed Decision's calculation methodology is flawed and yields payments that exceed SCE's avoided cost because it fails to properly deduct ancillary services value from the combustion turbine fixed charge. The $60.84/kW-yr "as-available" capacity price for 2007 adopted by the Proposed Decision is based on the $65.78/kW-yr real economic carrying charge for a combustion turbine, as proposed by The Utility Reform Network (TURN),[28] less $4.94/kW-yr of "estimated"

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[24] *See id.* at 85, 90.
[25] *See* SCE Opening Brief at 42-43.
[26] SCE Opening Testimony, Ex. 1 at 4:17-18, 91:10-11.
[27] *See id.*
[28] *See* Proposed Decision at 85-90, Table 4a; TURN Opening Testimony, Ex. 149 at B-4.

ancillary services that would be provided by a combustion turbine but is not provided by an "as-available" QF.[29] The $4.94/kW-yr deduction for ancillary services is based on $14.82/kW-yr of combustion turbine ancillary services value calculated by San Diego Gas & Electric Company (SDG&E), reduced by two-thirds "to reflect the fact that SDG&E's value . . . is more indicative of a peak value."[30] The Proposed Decision's elimination of nearly $10/kW-yr of combustion turbine ancillary services value is unfounded, is illogical and has no support in the record.

It is undisputed that there should be a deduction from the combustion turbine fixed charge to account for ancillary services value that is not provided by "as-available" QFs. CCC witness Beach agreed that there should be a deduction from the combustion turbine fixed costs used to establish the "as-available" capacity payment to account for hours in which the proxy combustion turbine would not produce energy but, instead, would sell ancillary services.

> Q: Can you accept SDG&E's position that revenues from sales of ancillary services (A/S) should be netted out from the fixed costs of a [combustion turbine]?
>
> A: Yes, but only if the [combustion turbine] is assumed not to participate in the day-ahead energy market.[31]

"[Y]ou can assume a certain level of, you know, off-peak and mid-peak revenues from selling [] ancillary services, but you can't – you can't assume that you're going to get ancillary service revenues from the unit for every hour of the year."[32] Mr. Beach was concerned that SDG&E "may have used ancillary service prices that include very high ancillary services prices during peak periods . . . because you can't run your [combustion turbine] and get ancillary services at the same time"[33] However, as discussed below, SDG&E witness Barker's testimony establishes that Mr. Beach's concern was unfounded. "If it is producing energy I *didn't* include it . . . ."[34]

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[29] *See* Proposed Decision at 85, 90. It appears that Table 4a of the Proposed Decision failed to deduct the $4.94/kW-yr of estimated ancillary services value from the $65.78/kW-yr capacity price shown.

[30] *Id.* at 90.

[31] CCC Rebuttal Testimony, Ex. 103 at 43:19-21; *see also* Proposed Decision at 88.

[32] CCC/Beach, Tr. Vol. 28 at 4031:1-5.

[33] *Id.* at 4031:18-23.

[34] SDG&E/Barker, Tr. Vol. 25 at 3717:15-16 (*emphasis added*).

In addition, the Federal Energy Regulatory Commission (FERC) recognized that a deduction for ancillary services is appropriate when calculating capacity costs in its order approving the Reliability Pricing Model (RPM) used in the PJM capacity market.[35] Under the RPM, the "Cost of New Entry [is] offset by the net energy and ancillary services revenues . . . ."[36] "[T]he height of the [demand] curve is determined in large part by net Cost of New Entry, which is Cost of New Entry net of the Net Energy and Ancillary Service Revenue offset."[37]

The Proposed Decision's claim that "SDG&E's value . . . is more indicative of a peak value" is unfounded. Dr. Barker's testimony during cross-examination demonstrates that SDG&E's ancillary services value is, in fact, more of an off-peak and mid-peak value, than a peak value. During cross-examination, Dr. Barker explained that his calculation of $14.82/kW-yr of ancillary services revenues *did not* assume that the combustion turbine would bid into the ancillary services market in all hours.[38] The hours in which the combustion turbine is producing energy are relatively high-cost hours,[39] and "[i]f it is producing energy I *didn't* include it, and I also took out some time for maintenance."[40] Thus, by eliminating the hours in which the combustion turbine is producing energy from his ancillary service calculation, Dr. Barker eliminated the *highest* cost peak hours. As a result, the $14.82/kW-yr of ancillary services value calculated by SDG&E is more representative of an off-peak and mid-peak value, than a peak value.

Furthermore, there is additional evidence in the record that demonstrates the reasonableness of the $14.82/kW-yr of ancillary services value calculated by SDG&E. The CAISO Department of Market Analysis (DMA) calculated that a new combustion turbine would

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35 *See PJM Interconnection, LLC, Order Denying Rehearing and Approving Settlement Subject to Conditions*, 117 FERC ¶ 61,331, 62,657 (Dec. 22, 2006).

36 *Id.*

37 *Id.*

38 *See* SDG&E/Barker, Tr. Vol. 25 at 3717:10-12.

39 *See id.* at 3717:25-27.

40 *Id.* at 3717:15-16 (*emphasis added*).

have earned $19.20/kW-yr of ancillary services revenue for selling its output in SP-15 during 2003 and would have earned $27.80/kW-yr of ancillary services revenues for selling its output in SP-15 during 2004.[41]

The evidence of record unequivocally demonstrates that SDG&E properly calculated $14.82/kW-yr of ancillary services value associated with a combustion turbine and that this is a very reasonable value. Therefore, there is no basis for reducing SDG&E's value by two-thirds. To the extent the Commission retains a separate "as-available" capacity payment, the Proposed Decision should be modified to deduct the full $14.82/kW-yr of ancillary services value from the combustion turbine fixed charge in calculating the "as-available" capacity payment payment. For 2007, this would yield an "as-available" capacity price of $50.96/kW-yr: $65.78/kW-yr less $14.82/kW-yr of ancillary services value.

2. <u>The "As-Available" Capacity Price Adopted in the Proposed Decision Should Only Be Paid To The Extent The Capacity Satisfies Resource Adequacy Obligations</u>

The Proposed Decision states that "as-available" capacity payments "will no longer be contingent on [resource adequacy] counting rules.[42] According to the Proposed Decision, "further consideration of any 'disparity' between the adopted [resource adequacy] counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will not be contingent upon future determinations on the [resource adequacy] counting rules."[43] This aspect of the Proposed Decision will yield payments that exceed SCE's avoided cost to the extent "as-available" QF contracts will not satisfy SCE's resource adequacy obligations. As SCE explained in its testimony, the avoided cost of capacity associated with an "as-available" resource is *zero* unless

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[41] *See* Ex. 48 at 2-29–2-30 (California Independent System Operator 2004 Annual Report on Market Issues and Performance).

[42] Proposed Decision at 87.

[43] *Id.*

that resource can satisfy a load-serving entity's resource adequacy obligations.[44] Therefore, the Proposed Decision should be modified to state that, to the extent "as-available" QF contracts will not satisfy SCE's resource adequacy obligations, the avoided cost of "as-available" capacity is zero.

3. The Firm Capacity Price Adopted in the Proposed Decision Exceeds SCE's Avoided Cost Because It Fails to Deduct Energy-Related Capital Costs and Residual Value

The Proposed Decision adopts a firm capacity price of $104/kW-yr "based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of $980/kW, annualized over a 20-year term at a Weighted-Average Cost of Capital (WACC) rate of 8.5% . . . ."[45] As discussed below, the $104/kW-yr capacity price overpays for capacity because it fails to deduct energy-related capital costs and fails to adjust for the residual value of the MPR proxy as a result of having an operating life greater than 20 years. To properly reflect SCE's avoided cost of capacity, the $104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least $21/kW-yr to account for energy-related capital costs and by $10/kW-yr to account for residual value, yielding a firm capacity price no greater than $73/kW-yr.[46]

a) The Firm Capacity Price In The Proposed Decision Should Be Reduced By At Least $21/kW-yr To Account For Energy-Related Capital Costs

As the Proposed Decision explains, the $104/kW-yr firm capacity price is computed from the full capital cost of the combined-cycle gas turbine proxy used in the MPR, which has an average heat rate of 6,918 Btu/kWh.[47] The undisputed evidence in this proceeding demonstrates

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[44] *See* SCE Opening Testimony, Ex. 1 at 94:9-14.
[45] Proposed Decision at 85-86.
[46] *See* SCE Rebuttal Testimony, Ex. 2 at 79.
[47] *See id.* at 92; Res. E-4049 at 10-11, Appx. E.

that, as a result of its relatively low heat rate, a combined-cycle gas turbine will run "in-the-money" and receive additional energy-related operating profits in many hours of the year.[48] Those additional energy-related operating profits, known as energy-related capital costs or inframarginal rents, offset a portion of the combined-cycle gas turbine's fixed costs and must be deducted from the annualized capital cost to avoid over-payment for capacity.[49] As CCC witness Beach explained, "[t]he energy component of the LRAC price will cover some of the combined-cycle gas turbine's capital costs – so-called 'energy-related capital costs' – which are higher than the capital costs of a simple-cycle [combustion turbine], in order for the [combined-cycle gas turbine] to achieve a much lower heat rate."[50] Even CAC/EPUC witness Schoenbeck acknowledged that "some portion of the capital cost of a combined-cycle gas turbine essentially pays for the lower heat rate that a combined-cycle gas turbine has compared to a simple-cycle combustion turbine."[51]

FERC has also recognized that a deduction for energy revenues, sometimes referred to as peak energy rents (PER), is appropriate when calculating capacity costs. As discussed above, FERC's order approving the RPM used in the PJM capacity market adopted the use of an offset for net energy revenues.[52] In addition, FERC's orders approving the ISO New England's Forward Capacity Market (FCM) adopted the use of a PER offset to monthly capacity payments.[53] As FERC explained,

> [c]apacity suppliers will have their monthly capacity payments reduced to account for [the following] phenomena. [A] "peak energy rent" sum will be deducted from monthly capacity payments. The peak energy rent sum, originally developed in the

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[48] *See* SCE Rebuttal Testimony, Ex. 2 at 73, 79.

[49] *See id.*

[50] CCC Opening Testimony, Ex. 102 at 79:3-6.

[51] CAC/EPUC/Schoenbeck, Tr. Vol. 29 at 4267:26-4268:1.

[52] *See PJM Interconnection, LLC*, 117 FERC at 62,657 ("Cost of New Entry [is] offset by the net energy and ancillary services revenues . . . . [T]he height of the [demand] curve is determined in large part by net Cost of New Entry, which is Cost of New Entry net of the Net Energy and Ancillary Service Revenue offset.").

[53] *See Devon Power LLC*, *Order Accepting Proposed Settlement Agreement*, 115 FERC ¶ 61,340, 62,307 (Jun. 16, 2006); *Devon Power LLC*, *Order on Rehearing and Clarification,* 117 FERC ¶ 61,133 (Oct 31, 2006).

> LICAP proposal, is based on revenues that would be earned in the energy market by a hypothetical, proxy peaking unit.[54]

"The PER offset was designed to adjust the LICAP [capacity] payments with the energy market profits from a benchmark unit to assure that the [capacity] payments did not double-count energy rents."[55]

There is no direct evidence in this proceeding of the energy-related capital costs specific to the combined-cycle gas turbine proxy used in the MPR. However, evidence of record clearly establishes that the energy benefits associated with the MPR proxy unit exceed \$21/kW-yr. In its rebuttal testimony, SCE analyzed the energy benefits associated with SDG&E's 2005 RAMCO peaking project.[56] SCE's analysis demonstrated that the fixed cost of the RAMCO project should be reduced by \$21/kW-yr to account for energy-related capital costs associated with this energy-efficient combustion turbine.[57]

The RAMCO project is a General Electric LM6000 simple-cycle combustion turbine with a heat rate of 8,434 Btu/kWh (LHV).[58] However, as discussed above, the average heat rate of the combined-cycle gas turbine proxy used in the MPR is 6,918 Btu/kWh (HHV).[59] The energy-related capital cost of the combined-cycle gas turbine proxy used in the MPR will be *substantially greater* than the \$21/kW-yr of energy-related capital costs associated with the RAMCO simple-cycle combustion turbine because the MPR proxy unit has a much lower heat rate than the RAMCO simple-cycle combustion turbine. Therefore, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by *at least* \$21/kW-yr to account for energy-related capital cost.

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54 *Devon Power LLC*, *Order Accepting Proposed Settlement Agreement*, 115 FERC at 62,307.
55 *Devon Power LLC*, *Order on Rehearing and Clarification,* 117 FERC at n.75.
56 *See* SCE Rebuttal Testimony, Ex. 2 at 73.
57 *Id.* at 73, 75.
58 *Id* at 73 n.82.
59 *See* Res. E-4049 at Appx. E.

Such a reduction is entirely consistent with the testimony of QF Parties witness Cavicchi. As Mr. Cavicchi explained during cross-examination, the CAISO's DMA calculated that a new combustion turbine would have earned $45/kW-yr for selling its output in SP-15 during 2004:

> Q So what level of net revenues does the DMA calculate would be earned by a new combustion turbine for selling its output in SP15 during 2003?
>
> A $32 to $36 per kilowatt -- I'm sorry -- $36 per kilowatt year.
>
> Q That it is $36 per kilowatt year for SP15 figure for 2003, right?
>
> A That's what I said.
>
> Q Right. And what would the figure be for 2004?
>
> A $45 per kilowatt year.
>
> Q Is it your understanding that the term net revenues as it is used in this report here provides a contribution to the generator's recovery of fixed costs?
>
> A Yes, I believe that's the way this term is used in the report.[60]

The same CAISO report referenced by Mr. Cavicchi calculated that a new combined-cycle gas turbine would have earned $55/kW-yr for selling its output in SP-15 during 2004.[61] Thus, the $21/kW-yr reduction is a very conservative estimate of the energy-related capital cost associated with the combined-cycle gas turbine proxy used in the MPR. Therefore, the $104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least $21/kW-yr to account for energy-related capital costs.

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[60] QF/Cavicchi, Tr. Vol. 22 at 3228:17-3229:3; *see also* Ex. 48 at 2-29–2-30 (California Independent System Operator 2004 Annual Report on Market Issues and Performance).

[61] *See* Ex. 48 at 2-27–2-30.

b) **<u>The Firm Capacity Price In The Proposed Decision Should Also Be Reduced By $10/kW-yr To Account For The Residual Value Of The Combined-Cycle Gas Turbine Proxy</u>**

The $104/kW-yr firm capacity price in the Proposed Decision is "based on the market price referent (MPR) capacity cost . . . *annualized over a 20-year term* . . . ."[62] As SCE explained in its rebuttal testimony, annualizing the capital cost of a unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately $10/kW-yr.[63]

The appropriate life-cycle of the combined-cycle gas turbine proxy should be 30 years, not 20 years. "[M]any of SCE's former gas-fired peaking facilities have operated beyond the 30-year anniversary of their in-service dates."[64] "For example, the following Southern California natural gas peaking facilities were retired after more than 30 years of operating service: Alamitos Unit 7 (34 years), Etiwanda Unit 5 (35 years), and Huntington Beach Unit 5 (34 years). Furthermore, the following peakers are currently in operation: Elwood (built in 1974) and Mandalay Unit 3 (built in 1970)."[65] In addition, "SCE's own CTs at Mountainview [were] approved by the Commission based on an assumed 30-year economic/operating life."[66]

Even the combustion turbine capacity values that were proposed by TURN, and adopted by the Proposed Decision for "as-available" capacity pricing, are based on an economic life greater than 20 years. As TURN witness Marcus explained, "I used a 25-year book and economic life for the combustion turbine. SDG&E's RAMCO CT has a 25 year depreciable life . . . ."[67]

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62 Proposed Decision at 85-86 (*emphasis added*).
63 *See* SCE Rebuttal Testimony, Ex. 2 at 71-72.
64 *Id.* at 71.
65 *Id.* at 71 n.76.
66 *Id.* at 71.
67 TURN Opening Testimony, Ex. 149 at B-3.

Annualizing full capital cost recovery of a combined-cycle gas turbine over a 20-year term, instead of a 30-year economic/operating life, results in a higher capacity cost and fails to account for the "residual value" of the combined-cycle gas turbine after 20 years.[68] Table V-3 in SCE's rebuttal testimony provides several examples that quantify this residual value.[69] Overall, the residual value associated with a 20-year term is approximately $10/kW-yr.[70] Therefore, the $104/kW-yr firm capacity price in the Proposed Decision should be reduced by $10/kW-yr to account for the residual value of the combined-cycle gas turbine proxy, in addition to the above-described reduction for energy-related capital cost.

In total, the $104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least $21/kW-yr to account for energy-related capital costs and by $10/kW-yr to account for residual value, yielding a firm capacity price no greater than $73/kW-yr.

III.
THE PROPOSED DECISION COMMITS LEGAL ERROR IN FAILING TO ORDER A RETROACTIVE TRUE-UP OF SRAC ENERGY PRICES

The Proposed Decision states that "this decision updates the methodology for calculating SRAC energy prices *on a prospective basis only*, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California."[71] The sole basis offered for failing to order a retroactive true-up of SRAC energy prices is that "[s]ince the outset of the QF Program, SRAC energy prices have always been set on a prospective basis. With respect to retroactive adjustments of these prices, the Commission has generally declined to make retroactive downward adjustments."[72] This portion of the Proposed Decision commits legal error.

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[68] *See* SCE Rebuttal Testimony, Ex. 2 at 71-72, 75.
[69] *See id.* at 75.
[70] *Id.* at 72, 75.
[71] Proposed Decision at 9 *(emphasis added)*.
[72] *Id.* at 21.

The evidence of record clearly demonstrates that the SRAC transition formula current in place has yielded energy payments in excess of SCE's avoided cost for many years.[73] Under these circumstances, the Commission has both the authority[74] and the duty to order retroactive adjustment of SRAC prices to comport with the newly adopted MIF. The Second District Court of Appeal has expressly stated that the Commission has a *legal duty* to make appropriate retroactive adjustments to SRAC prices.[75] "[I]f the evidence shows that the formula in Decision No. 01-03-067 should have been applied retroactively to arrive at a more accurate SRAC, then it is the Commission's duty to apply it retroactively."[76] Indeed, in a more recent decision, the Court of Appeal also noted that the Commission declared "that if a decision in R.04-04-025 shows a systematic violation of PURPA, then Edison is to be given credit for any PURPA violations by reason of Edison being required to enter into SO1 contracts with QFs . . . ."[77] Therefore, to comply with the Court of Appeal's decisions, the Commission should modify the Proposed Decision to state that the Commission will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

IV.

THE PROPOSED DECISION SHOULD ALLOW SCE TO IMPLEMENT CREDIT PERFORMANCE REQUIREMENTS IN ALL NEW OR RENEWED QF CONTRACTS

The Proposed Decision provides that QFs with expiring contracts that seek to sign new one- to five-year "as-available" contracts or one- to ten-year firm capacity contracts "shall not be required to provide new credit support . . . ."[78] This portion of the Proposed Decision should be

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[73] *See* SCE Opening Testimony, Ex. 1 at 56-61.

[74] *See* D.01-12-025 at 4.

[75] *See S. Cal. Edison Co. v. Cal. P.U.C.*, 128 Cal. App. 4th 1, 12 (2005); *S. Cal. Edison Co. v. Cal. P.U.C.*, 101 Cal. App. 4th 982, 999 (2002).

[76] *S. Cal. Edison Co.*, 128 Cal. App. 4th at 12 (*quoting S. Cal. Edison Co.*, 101 Cal. App. 4th at 999).

[77] *S. Cal. Edison Co.*, 128 Cal. App. 4th at 12.

[78] Proposed Decision at 117.

modified to allow the utilities to pursue standard credit performance requirements in all new or renewed QF contracts.

Although current QF contracts do not contain credit performance requirements, these contracts pre-date the development of today's credit risk framework. Accordingly, the lack of credit performance requirements in current QF contracts is not a valid justification for eliminating credit performance requirements in new or renewed QF contracts. Including standard credit performance requirements in all new or renewed QF contracts will provide financial protection to utility ratepayers in the event of contractual non-performance by a QF. Therefore, the Proposed Decision should be modified to allow the utilities to pursue standard credit performance requirements in all new or renewed QF contracts.

V.
CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission adopt the Proposed Decision with the modifications described above and in Attachment A.

Respectfully submitted,

FRANK J. COOLEY
BERJ K. PARSEGHIAN

/s/ Berj K. Parseghian

By: Berj K. Parseghian

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3102
Facsimile: (626) 302-1904
E-mail: Berj.Parseghian@sce.com

May 25, 2007

ATTACHMENT A

Modify text on page 2 as follows:

- ~~Two Standard Contract Options for Expiring or Expired QF Contracts and New QFs – Our Prospective QF Program:~~
  - ~~One- to Five-Year As-Available Power Contract.~~
  - ~~One- to Ten-Year Firm, Unit-Contingent Power Contract.~~
  - QFs will ~~also~~ continue to have the option of either participating in Investor-Owned Utilities (IOU) power solicitations, or negotiating bilateral contracts with the IOUs.

Modify text on page 3 as follows:

- ~~Payments for Firm Capacity: Based on the market price referent (MPR) capacity cost adopted in Resolution E-40492 of $980/kW, annualized over a 20-year term at a Weighted-Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of $104/kW-year.~~
- ~~The EEI contract will be the basis for our Prospective QF Program contract options, however, a simplified version of the EEI contract shall be utilized for Small QFs.~~

Modify text on pages 7 and 8 as follows:

~~However, we are persuaded that there are currently few options to utility purchases, particularly for Small QFs, whose size prevents them from participation in the CAISO markets. These QF should continue to have available standard offers, albeit at market prices.~~

For these reasons, we adopt ~~two flexible market-based contract options in addition to~~ the competitive solicitation and bilateral contracting options already available to QFs as our implementation of PURPA. ~~To safeguard against oversubscription in the future, we adopt a process by which the utilities can request relief from the requirement to enter into the standard offers.~~

~~First, QFs who choose only to provide non-firm, as-available power will have access to a one- to five-year as-available contract with energy prices based on the MIF formula and posted as-available capacity payments based on the cost of a combustion turbine less the estimated value of Ancillary Services.~~

~~Second, we will make available a one-to-ten-year contract for firm unit-contingent power, with energy prices based on the MIF formula, and capacity payments based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of $980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of $104/kW-year. This longer-term contract option is intended to provide~~

~~sufficient contract and pricing certainty to allow QFs to make decisions on capital expenditures for facilities and upgrades.~~

Delete text on page 9 as follows:

~~Furthermore, this decision updates the methodology for calculating SRAC energy prices on a prospective basis only, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California.~~

Modify text on page 66 as follows:

(See Exhibit 1, pp. 64-65.) We will allow SDG&E and the other utilities to ~~annually~~ update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary.

Modify text on page 68 as follows:

As noted above, the Legislature did not adopt a specific formula, nor did it adopt specific TOU factors. Therefore, it is appropriate to update the TOU or TOD factors periodically. The evidence in this proceeding ~~clearly~~ demonstrates that the TOU/TOD data ~~is~~ <u>may, in some cases, be</u> outdated. <u>No party requested a change to SCE's TOU factors, and</u> ~~Unfortunately,~~ the parties recommending specific changes to the TOU/TOD factors and periods did not provide a sufficient showing to support their recommendations. Nevertheless, we believe that updating the IOUs TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings is reasonable and will require the IOUs to ~~include the TOU/TOD factors and periods utilized as part of their most recent RFOs. We also require the IOUs to~~ provide updated TOU/TOD factors and periods when they file their next long-term procurement plans for approval.

Delete text on pages 85-86 as follows:

~~Today, we adopt two contract options for expiring or expired QF contracts and new QFs – Our Prospective QF Program. The first option is a one- to five-year as-available power contract. The second is a one- to ten-year firm, unit-contingent power contract.~~ Payments for as-available capacity will be based on the fixed cost of a Combustion Turbine (CT) as proposed by The Utility Reform Network (TURN), less the estimated value of Ancillary Services (A/S) as generally proposed by San Diego Gas & Electric Company (SDG&E). ~~Payments for firm, unit-contingent capacity will be based on the market price referent (MPR) capacity cost adopted in Resolution E-404985 of $980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of $104/kW-year.~~

Delete text on pages 86-87 as follows:

~~The issue of whether any of this QF power counts for purposes of RA is now moot with respect to the capacity payments because the capacity payments will no longer be contingent on RA counting rules. This follows from the fact that we cannot reasonably institute a meaningful long-term policy for expiring QF contracts, nor a policy for the entry of new QFs unless there is a capacity payment commitment.~~

Modify text on page 87 as follows:

At this point, further consideration of any 'disparity' between the adopted RA counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will ~~not~~ be contingent upon future determinations on the RA counting rules. ~~Instead, the RA counting rules can count or not count QF power, depending upon how the RA portfolios will be conceptualized in the future.~~

Modify text on page 90 as follows:

For the as-available contract option, we adopt the CT cost and real economic carrying charge rate calculations proposed by TURN as presented in Exhibit 149, Appendix B, with an ancillary services adjustment of $14.82/kW-year subtracted from the adopted value as suggested by SDG&E. ~~The estimated ancillary services value proposed by SDG&E is an annual average value; however, we believe this is an over-estimate and should be adjusted downward to reflect the fact that SDG&E's value of $14.82/kW-year is more indicative of a peak value. Accordingly, we reduce it by two-thirds to $4.94/kW-year.~~ TURN calculates a total marginal CT cost of $64.13/kW-year in 2006. Using the adopted TURN value for $64.13, the resulting capacity value would be $49.31/kW-year ~~$59.19/kW-year~~ ($64.13/kW-year - $14.82/kW-year~~$4.94/kW-year~~).

Delete section 6 of text on pages 90 – 93

Delete text on page 116 as follows:

~~First, for existing QFs, the utilities shall offer new one- to five-year, as-available standard offer contracts to QFs. The contracts shall be updated to require compliance with CAISO tariffs, including the Resource Adequacy (RA) tariff. However, QFs with expiring contracts seeking to sign new, one- to five-~~

Delete text on page 117

Modify text on page 118 as follows:

~~should they be required to perform additional interconnection studies. QFs larger than one megawatt are responsible for scheduling coordination, although the utilities must offer scheduling service to QFs at a reasonable cost. QFs who are not able to offer unit firm capacity will be able to either continue on a one- to five-year as-available contract from year to year or may participate in utility resource solicitations and bilateral negotiations.~~

~~The third option, available to~~ QFs ~~desiring longer-term contracts or more flexible contract options, is to~~ may participate in utility resource solicitations or bilateral negotiations.

Modify text on page 120 as follows:

In conclusion, we find that ~~a combination of market-based offers along with~~ the ability to compete for ~~longer-term~~ contracts best reflects the utilities' avoided cost and meets California's goals for acquiring and retaining cost-effective, environmentally sound generation.

Delete text on page 121 as follows:

~~Furthermore, requiring the utilities to make available one to ten-year unit firm capacity contracts, as well as optional one- to five-year as-available contracts is consistent with and supports one of the key actions in the EAP II.~~

Delete section 7.4.1 of text on pages 122-124

Modify Finding of Fact No. 32 as follows:

32. ~~It is reasonable to reduce the estimated ancillary services value proposed by SDG&E by two-thirds to reflect the fact that SDG&E's value is an annual average value and ancillary services needs occur primarily in peak periods. Accordingly, we reduce SDG&E's suggested ancillary services value by two-thirds to $4.94/kW-year.~~We adopt SDG&E's suggested ancillary services value of $14.82/kW-year.

Delete Finding of Fact No. 33

Add Conclusion of Law after Conclusion of Law No. 6 as follows:

To the extent "as-available" QF contracts will not satisfy resource adequacy obligations, the avoided cost of "as-available" capacity is zero and the "as-available" capacity price shall be set to zero.

Add Conclusion of Law No. 17 as follows:

We will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

Add Conclusion of Law No. 18 as follows:

All new or renewed QF contracts must comply with the greenhouse gas emissions performance standard to the extent required by Senate Bill 1368 and Decision No. 07-01-039.

Delete Ordering Paragraph No. 2

Delete Prospective QF Program columns from Table 1

Modify Table 1, Footnote * as follows:

* The heat rate component of the Market Index Formula is that proposed by SCE~~, except for the O&M deduction~~, Exhibit 1, p.61.

Modify Table 4, Table Notes as follows:

Heat rates in the table above will be calculated monthly, as described in Exhibit 1~~, with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation~~. Note that current heat rates may be slightly different at NP15 and SP15, respectively, due to fluctuating market conditions.

~~To illustrate the MIF, heat rate data from the record is shown. The heat rate of 7903 Btu/kWh is from Exhibit 1, Figure 10, Sample Derivation of IER, page 63 for the August 2004 through July 2005 time period; however, the variable O&M adder is set to zero in Column B in Figure 10 in the heat rate calculation (not subtracting it from the power price). Thus, the adopted heat rate is an unadjusted market heat rate.~~

Modify Table 4a to indicate an adopted as-available capacity price of $50.96/kW-yr for 2007

Modify Table 4a to delete Adopted Unit-Contingent, Firm Power row

Delete Table 4a, Table Notes

ATTACHMENT B

Modify text on page 2 as follows:

- ~~Two Standard Contract Options for Expiring or Expired QF Contracts and New QFs – Our Prospective QF Program:~~
    - ~~One- to Five-Year As-Available Power Contract.~~
    - ~~One- to Ten-Year Firm, Unit-Contingent Power Contract.~~
    - QFs will ~~also~~ continue to have the option of either participating in Investor-Owned Utilities (IOU) power solicitations, or negotiating bilateral contracts with the IOUs.

Modify text on page 3 as follows:

- Payments for Firm Capacity: Based on the market price referent (MPR) capacity cost adopted in Resolution E-40492 of $980/kW, annualized over a 20-year term at a Weighted-Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of $73/kW-year ~~$104/kW-year~~.
- ~~The EEI contract will be the basis for our Prospective QF Program contract options, however, a simplified version of the EEI contract shall be utilized for Small QFs.~~

Modify text on page 8 as follows:

Second, we will make available a one-to-ten-year contract for firm unit-contingent power, with energy prices based on the MIF formula, and capacity payments based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of $980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of $73/kW-year ~~$104/kW-year~~.

Delete text on page 9 as follows:

~~Furthermore, this decision updates the methodology for calculating SRAC energy prices on a prospective basis only, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California.~~

Modify text on page 66 as follows:

(See Exhibit 1, pp. 64-65.) We will allow SDG&E and the other utilities to ~~annually~~ update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary.

Modify text on page 68 as follows:

As noted above, the Legislature did not adopt a specific formula, nor did it adopt specific TOU factors. Therefore, it is appropriate to update the TOU or TOD factors periodically. The evidence in this proceeding ~~clearly~~ demonstrates that the TOU/TOD data ~~is~~ may, in some cases, be outdated. No party requested a change to SCE's TOU factors, and ~~Unfortunately,~~ the parties recommending specific changes to the TOU/TOD factors and periods did not provide a sufficient showing to support their recommendations. Nevertheless, we believe that updating the IOUs TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings is reasonable and will require the IOUs to ~~include the TOU/TOD factors and periods utilized as part of their most recent RFOs. We also require the IOUs to~~ provide updated TOU/TOD factors and periods when they file their next long-term procurement plans for approval.

Modify text on page 86 as follows:

a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of $73/kW-year ~~$104/kW-year~~.

Delete text on pages 86-87 as follows:

~~The issue of whether any of this QF power counts for purposes of RA is now moot with respect to the capacity payments because the capacity payments will no longer be contingent on RA counting rules. This follows from the fact that we cannot reasonably institute a meaningful long-term policy for expiring QF contracts, nor a policy for the entry of new QFs unless there is a capacity payment commitment.~~

Modify text on page 87 as follows:

At this point, further consideration of any 'disparity' between the adopted RA counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will ~~not~~ be contingent upon future determinations on the RA counting rules. ~~Instead, the RA counting rules can count or not count QF power, depending upon how the RA portfolios will be conceptualized in the future.~~

Modify text on page 90 as follows:

For the as-available contract option, we adopt the CT cost and real economic carrying charge rate calculations proposed by TURN as presented in Exhibit 149, Appendix B, with an ancillary services adjustment of $14.82/kW-year subtracted from the adopted value as suggested by SDG&E. ~~The estimated ancillary services value proposed by SDG&E is an annual average value; however, we believe this is an over-estimate and should be adjusted downward to reflect the fact that SDG&E's value of $14.82/kW-year is more indicative of a peak value. Accordingly, we reduce it by two-thirds to $4.94/kW-year.~~ TURN calculates a total marginal CT cost of $64.13/kW-year in 2006. Using the adopted TURN value for $64.13, the resulting capacity value would be $49.31/kW-year ~~$59.19/kW-year~~ ($64.13/kW-year - $14.82/kW-year~~$4.94/kW-year~~).

Modify Table 7 on page 92 to indicate an adopted capacity price of $73/kW-year

Add text on page 93 after Figure 2 as follows:

From this $104/kW-yr capacity price, we must deduct energy-related capital costs and adjust for the residual value of the MPR proxy as a result of having an operating life greater than 20 years. As a result of its relatively low heat rate, a combined-cycle gas turbine will run "in-the-money" and receive additional energy-related operating profits in many hours of the year. Those additional energy-related operating profits, known as energy-related capital costs, offset a portion of the combined-cycle gas turbine's fixed costs and must be deducted from the capacity price to avoid over-payment for capacity. The energy-related capital cost of the combined-cycle gas turbine proxy used in the MPR will be at least $21/kW-yr, the energy-related capital costs associated with the RAMCO simple-cycle combustion turbine, because the MPR proxy unit has a much lower heat rate than the RAMCO simple-cycle combustion turbine.

In addition, the $104/kW-yr capacity price is based on the MPR capacity cost annualized over a 20-year term. However, as SCE explained in its rebuttal testimony, annualizing the capital cost of a unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately $10/kW-yr, which must be deducted. Therefore, to properly reflect the avoided cost of capacity, the $104/kW-yr firm capacity price should be reduced by $21/kW-yr to account for energy-related capital costs and by $10/kW-yr to account for residual value, yielding a firm capacity price of $73/kW-yr.

Modify text on page 117 as follows:

year as-available contract shall ~~not~~ be required to provide standard~~new~~ credit support provisions but shall not be required to provide~~nor~~ new interconnection studies.

Modify text on pages 117-118 as follows:

The new contracts will also have updated performance requirements to reflect the firm capacity, but QFs with expiring contracts seeking to sign new unit-firm contracts shall ~~not~~ have to provide standard~~new~~ credit support, but~~nor~~ should not~~they~~ be required to perform additional interconnection studies.

Modify Finding of Fact No. 32 as follows:

32. ~~It is reasonable to reduce the estimated ancillary services value proposed by SDG&E by two-thirds to reflect the fact that SDG&E's value is an annual average value and ancillary services needs occur primarily in peak periods. Accordingly, we reduce SDG&E's suggested ancillary services value by two-thirds to $4.94/kW-year.~~We adopt SDG&E's suggested ancillary services value of $14.82/kW-year.

Add Finding of Fact No. 37 as follows:

The benefits and costs of new QF obligations should be allocated to all customers to avoid imposing potential stranded costs solely on utilities.

Add Conclusion of Law after Conclusion of Law No. 6 as follows:

To the extent "as-available" QF contracts will not satisfy resource adequacy obligations, the avoided cost of "as-available" capacity is zero and the "as-available" capacity price shall be set to zero.

Add Conclusion of Law No. 17 as follows:

We will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

Add Conclusion of Law No. 18 as follows:

The contracts adopted by this decision will only be available to existing QFs with contracts that expire in a rolling 24-month window and to new QFs that will come online within a rolling 36-month window. These contacts will cease to be available from a utility as of the effective date of a FERC order terminating that utility's PURPA purchase obligation.

Add Conclusion of Law No. 19 as follows:

The benefits and costs of new QF obligations should be allocated to all customers. Public Utilities Code section 380(g) authorizes the Commission to allocate the costs of QF contract obligations entered into for system reliability reasons to all customers. In addition, Public Utilities Code section 380(b) authorizes the Commission to equitably allocate the cost of generating capacity and prevent shifting of costs between customer classes.

Add Conclusion of Law No. 20 as follows:

All new or renewed QF contracts must comply with the greenhouse gas emissions performance standard to the extent required by Senate Bill 1368 and Decision No. 07-01-039.

Modify Table 1, No. 2a as follows:

Based on the MPR capacity cost in E-4049 of $980/kW which results in an annual cost of $73/kW-year ~~$104/kW-year~~.

Modify Table 1, No. 8 as follows:

Standard Credit Requirements~~None~~

Modify Table 1, Footnote * as follows:

* The heat rate component of the Market Index Formula is that proposed by SCE~~, except for the O&M deduction~~, Exhibit 1, p.61.

Modify Table 4, Table Notes as follows:

Heat rates in the table above will be calculated monthly, as described in Exhibit 1~~, with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation~~. Note that current heat rates may be slightly different at NP15 and SP15, respectively, due to fluctuating market conditions.

~~To illustrate the MIF, heat rate data from the record is shown. The heat rate of 7903 Btu/kWh is from Exhibit 1, Figure 10, Sample Derivation of IER, page 63 for the August 2004 through July 2005 time period; however, the variable O&M adder is set to zero in Column B in Figure 10 in the heat rate calculation (not subtracting it from the power price). Thus, the adopted heat rate is an unadjusted market heat rate.~~

Modify Table 4a to indicate an adopted as-available capacity price of $50.96/kW-yr for 2007

Modify Table 4a to indicate an adopted unit-contingent, firm capacity price of $73/kW-year

Modify Table 4a, Table Notes as follows:

where Capacity Payment = $73/kW-year ~~$104/kW-year~~ ÷ 8.760 = $8.3 ~~$11.8~~ per MWh

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

> Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **25th day of May, 2007**, at Rosemead, California.

____*/s/ Sara Carillo*______________________________
Sara Carrillo
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

KENNETH E. ABREU
853 OVERLOOK COURT
SAN MATEO, CA 94403
R.04-04-003 QF Issues

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201
R.04-04-003 QF Issues

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
R.04-04-003 QF Issues

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

E. JESUS ARREDONDO
DIRECTOR, REGULATORY AND GOVERNMENTAL
NRG ENERGY, INC.
3741 GRESHAM LANE
SACRAMENTO, CA 95835
R.04-04-003 QF Issues

MICHAEL A. BACKSTROM
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

GEORGETTA J. BAKER
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
101 ASH STREET, HQ 13
SAN DIEGO, CA 92101
R.04-04-003 QF Issues

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.04-04-003 QF Issues

GREG BASS
SEMPRA ENERGY SOLUTIONS
101 ASH STREET. HQ09
SAN DIEGO, CA 92101-3017
R.04-04-003 QF Issues

TOM BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710
R.04-04-003 QF Issues

ROGER BERLINER
PRESIDENT
BERLINER LAW PLLC
1747 PENNSYLVANIA AVE. N.W., STE 825
WASHINGTON, DC 20006
R.04-04-003 QF Issues

Traci Bone
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5206
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, 5TH FLOOR
WALNUT CREEK, CA 94596
R.04-04-003 QF Issues

KAREN BOWEN
ATTORNEY AT LAW
WHITE & CASE, LLP
4 EMBARCADERO CENTER, 24th FLOOR
SAN FRANCISCO, CA 94111
R.04-04-003 QF Issues

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
R.04-04-003 QF Issues

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124
R.04-04-003 QF Issues

MARGARET D. BROWN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442
R.04-04-003 QF Issues

NINA BUBNOVA
CASE MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.04-04-003 QF Issues

MAURICE CAMPBELL
MEMBER
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
1100 BRUSSELS ST.
SAN FRANCISCO, CA 94134
R.04-04-003 QF Issues

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

Theresa Cho
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5207
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

Susannah Churchill
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

KRIS G. CHISHOLM
CALIFORNIA ELECTRICITY OVERSIGHT BOARD
770 L STREET, SUITE 1250
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

HOWARD W. CHOY
DIVISION MANAGER
LOS ANGELES COUNTY ISD, FACILITIES OPERA
1100 NORTH EASTERN AVENUE
LOS ANGELES, CA 90063
R.04-04-003 QF Issues

JANET COMBS
LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

BRIAN CRAGG
ATTORNEY AT LAW
GOODIN, MAC BRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.04-04-003 QF Issues

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS, CA 95762
R.04-04-003 QF Issues

Karen A Degannes
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

REGINA M. DEANGELIS
ATTORNEY AT LAW
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

Shannon Eddy
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4102
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

RICHARD D. ELY
DAVIS HYDRO
27264 MEADOWBROOK DRIVE
DAVIS, CA 95618
R.04-04-003 QF Issues

RICHARD M. ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG, NJ 7849
R.04-04-003 QF Issues

ANNE FALCON
EES CONSULTING, INC.
570 KIRKLAND AVE
KIRLAND, WA 98033
R.04-04-003 QF Issues

DIANE I. FELLMAN
LAW OFFICE OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.04-04-003 QF Issues

LAW DEPARTMENT FILE ROOM
LAW DEPT FILE ROOM
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 7442
PO BOX 770000 MAILCODE B30A
SAN FRANCISCO, CA 94120-7442
R.04-04-003 QF Issues

CENTRAL FILES
CENTRAL FILES
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1530
R.04-04-003 QF Issues

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.04-04-003 QF Issues

STACIE FORD
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.04-04-003 QF Issues

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.04-04-003 QF Issues

JOHN C. GABRIELLI
GABRIELLI LAW OFFICE
430 D STREET
DAVIS, CA 95616
R.04-04-003 QF Issues

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.04-04-003 QF Issues

MARY A. GANDESBERY
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.04-04-003 QF Issues

LAURA GENAO
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX, CA 94978
R.04-04-003 QF Issues

ROBERT B. GEX
ATTORNEY AT LAW,
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111-3611
R.04-04-003 QF Issues

MICHAEL J. GIBBS
ICF CONSULTING
14724 VENTURA BLVD., NO. 1001
SHERMAN OAKS, CA 91403
R.04-04-003 QF Issues

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
R.04-04-003 QF Issues

STEVEN A. GREENBERG
DISTRIBUTED ENERGY STRATEGIES
4100 ORCHARD CANYON LANE
VACAVILLE, CA 95688
R.04-04-003 QF Issues

JOHN E. GREENHALGH
NEW ERA ENERGY, INC.
PO BOX 121
WILLIAMSBURG, VA 23090-0121
R.04-04-003 QF Issues

STEVEN F. GREENWALD
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
R.04-04-003 QF Issues

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA STREET, 41ST FLOOR
Center for Energy and Economic Development
SAN FRANCISCO, CA 94111
R.04-04-003 QF Issues

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 7450
R.04-04-003 QF Issues

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 2203
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

BRIAN HANEY
UTILITY SYSTEM EFFICIENCIES, INC.
1000 BOURBON ST., 341
NEW ORLEANS, LA 70116
R.04-04-003 QF Issues

PETER W HANSCHEN
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596
R.04-04-003 QF Issues

MARK HARRER
56 ST. TIMOTHY CT.
DANVILLE, CA 94526
R.04-04-003 QF Issues

TIM HEMIG
DIRECTOR
NRG ENERGY, INC.
1819 ASTON AVENUE, SUITE 105
CARLSBAD, CA 92008
R.04-04-003 QF Issues

PHILIP HERRINGTON
REGIONAL VP, BUSINESS MANAGEMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVENUE, STE 1700
IRVINE, CA 92612-1046
R.04-04-003 QF Issues

Donna J Hines
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4102
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

CHRISTOPHER HILEN
ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89511
R.04-04-003 QF Issues

SAM HITZ
CALIFORNIA CLIMATE ACTION REGISTRY
515 S. FLOWER STREET, STE 1640
LOS ANGELES, CA 90071
R.04-04-003 QF Issues

Charlyn A Hook
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5033
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN STREET, 6TH FLOOR
OAKLAND, CA 94612
R.04-04-003 QF Issues

PATRICK HOLLEY
COVANTA ENERGY CORPORATION
2829 CHILDRESS DR
ANDERSON, CA 96007-3563
R.04-04-003 QF Issues

DAVID L. HUARD
ATTORNEY AT LAW
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064
R.04-04-003 QF Issues

MARK R. HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
R.04-04-003 QF Issues

ERIC J. ISKEN
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-500
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.04-04-003 QF Issues

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

JOSEPH M. KARP
ATTORNEY AT LAW
WHITE & CASE LLP
4 EMBARCADERO CENTER, 24TH FLOOR
Smurfit Stone COntainer Corporation,
f.k.a.Jefferson Smurfit Corporation(U.S.)
SAN FRANCISCO, CA 94111-4050
R.04-04-003 QF Issues

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
R.04-04-003 QF Issues

RANDALL W. KEEN
MANATT PHELPS AND PHILLIPS LLP
11355 W. OLYMPIC BLVD.
LOS ANGELES, CA 90064
R.04-04-003 QF Issues

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

Sepideh Khosrowjah
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4101
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

Robert Kinosian
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4205
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

CHRIS KING
CALIFORNIA CONSUMER EMPOWERMENT
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
R.04-04-003 QF Issues

JOSEPH KLOBERDANZ
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123
R.04-04-003 QF Issues

MARC KOLB
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B918
SAN FRANCISCO, CA 94105
R.04-04-003 QF Issues

LAWRENCE KOSTRZEWA
REGIONAL VP, DEVELOPMENT
EDISON MISSION ENERGY
18101 VON KARMAN AVE., STE 1700
IRVINE, CA 92612-1046
R.04-04-003 QF Issues

EDWARD V. KURZ
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
R.04-04-003 QF Issues

PETER LAI
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
R.04-04-003 QF Issues

ERIC LARSEN
ENVIRONMENTAL SCIENTIST
RCM DIGESTERS
PO BOX 4716
BERKELEY, CA 94704
R.04-04-003 QF Issues

RICHARD LAUCKHART
HENWOOD ENERGY SERVICES, INC.
2379 GATEWAY OAKS DRIVE, SUITE 200
SACRAMENTO, CA 95833
R.04-04-003 QF Issues

STEVEN A. LEFTON
VP POWER PLANT PROJECTS
APTECH ENGINEERING SERVICES INC.
PO BOX 3440
SUNNYVALE, CA 94089-3440
R.04-04-003 QF Issues

MAUREEN LENNON
CALIFORNIA COGENERATION COUNCIL
595 EAST COLORADO BLVD., SUITE 623
PASADENA, CA 91101
R.04-04-003 QF Issues

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.04-04-003 QF Issues

Steve Linsey
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 2013
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.04-04-003 QF Issues

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
ANTELOPE, CA 95843
R.04-04-003 QF Issues

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
146 VICENTE ROAD
BERKELEY, CA 94705
R.04-04-003 QF Issues

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.04-04-003 QF Issues

BARRY LOVELL
BERRY PETROLEUM COMPANY
5201 TRUXTUN AVE., SUITE 300
BAKERSFIED, CA 93309
R.04-04-003 QF Issues

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105
R.04-04-003 QF Issues

ALEXANDRE B. MAKLER
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
R.04-04-003 QF Issues

WILLIAM B. MARCUS
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95608
R.04-04-003 QF Issues

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060
R.04-04-003 QF Issues

Wade McCartney
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

JIM MCARTHUR
PLANT MANAGER
ELK HILLS POWER, LLC
4026 SKYLINE ROAD
TUPMAN, CA 93276
R.04-04-003 QF Issues

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616
R.04-04-003 QF Issues

LIZBETH MCDANNEL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

PATRICK MCDONNELL
AGLAND ENERGY SERVICES, INC.
2000 NICASIO VALLEY RD.
NICASIO, CA 94946
R.04-04-003 QF Issues

DOUGLAS MCFARLAN
VP, PUBLIC AFFAIRS
MIDWEST GENERATION EME
440 SOUTH LASALLE ST., SUITE 3500
CHICAGO, IL 60605
R.04-04-003 QF Issues

TANDY MCMANNES
SOLAR THERMAL ELECTRIC ALLIANCE
101 OCEAN BLUFFS BLVD.APT.504
JUPITER, FL 33477-7362
R.04-04-003 QF Issues

BRADLEY MEISTER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-26
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

KEITH W. MELVILLE
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO, CA 92101
R.04-04-003 QF Issues

MARY ANN MILLER
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 96814-5512
R.04-04-003 QF Issues

WILLIAM A MONSEN
MRW & ASSOCIATES, INC.
1814 FRANKLIN ST. SUITE 720
OAKLAND, CA 94612
R.04-04-003 QF Issues

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.04-04-003 QF Issues

DAVID MORSE
1411 W, COVELL BLVD., SUITE 106-292
DAVIS, CA 95616-5934
R.04-04-003 QF Issues

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.04-04-003 QF Issues

ALISA NOCHOMOVITZ
WHITE & CASE, LLP
FOUR EMBARCADERO CENTER, 24TH FLOOR
RENEWABLE COALITION
SAN FRANCISCO, CA 94111-3162
R.04-04-003 QF Issues

ALAN NOGEE
UNION OF CONCERNED SCIENTISTS
2 BRATTLE SQUARE
CAMBRIDGE, MA 2238
R.04-04-003 QF Issues

RICK NOGER
PRAXAIR PLAINFIELD, INC.
2678 BISHOP DRIVE
SAN RAMON, CA 94583
R.04-04-003 QF Issues

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
Center for Energy and Economic Development
DENVER, CO 80202
R.04-04-003 QF Issues

Jerry Oh
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 3200
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

REN ORENS
ENERGY AND ENVIRONMENTAL ECONOMICS
353 SACRAMENTO ST., STE 1700
SAN FRANCISCO, CA 94111
R.04-04-003 QF Issues

Karen P Paull
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

BERJ K. PARSEGHIAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

Marion Peleo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
418 BENVENUE AVENUE
LOS ALTOS, CA 94024
R.04-04-003 QF Issues

WILLIAM E. POWERS
POWERS ENGINEERING
4452 PARK BLVD., STE. 209
SAN DIEGO, CA 92116
R.04-04-003 QF Issues

Terrie D Prosper
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5301
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013
R.04-04-003 QF Issues

ALAN PURVES
CALIFORNIA LANDFILL GAS COALITION
5717 BRISA STREET
LIVERMORE, CA 94550
R.04-04-003 QF Issues

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710
R.04-04-003 QF Issues

W. PHILLIP REESE
CALIFORNIA BIOMASS ENERGY ALLIANCE, LLC
PO BOX 8
SOMIS, CA 93066
R.04-04-003 QF Issues

EDWARD C. REMEDIOS
33 TOLEDO WAY
SAN FRANCISCO, CA 94123-2108
R.04-04-003 QF Issues

DAVID REYNOLDS
ASPEN SYSTEMS CORPORATION
5802 BALFOR ROAD
ROCKLIN, CA 95765
R.04-04-003 QF Issues

GRANT A. ROSENBLUM
STAFF COUNSEL
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.04-04-003 QF Issues

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.04-04-003 QF Issues

KATHERINE RYZHAYA
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.04-04-003 QF Issues

ROBERT SARVEY
501 W. GRANTLINE RD
TRACY, CA 95376
R.04-04-003 QF Issues

DAVID SAUL
COO
SOLEL, INC.
701 NORTH GREEN VALLEY PKY, STE 200
HENDERSON, NV 89074
R.04-04-003 QF Issues

J.A. SAVAGE
CALIFORNIA ENERGY CIRCUIT
3006 SHEFFIELD AVE.
OAKLAND, CA 94602
R.04-04-003 QF Issues

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

JANINE L. SCANCARELLI
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111
R.04-04-003 QF Issues

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714
R.04-04-003 QF Issues

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660
R.04-04-003 QF Issues

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
DENVER, CO 80202
R.04-04-003 QF Issues

ROBERT SHAPIRO
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20036
R.04-04-003 QF Issues

NORA SHERIFF
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 7450
R.04-04-003 QF Issues

TOM SKUPNJAK
CPG ENERGY
5211 BIRCH GLEN
RICHMOND, TX 77469
R.04-04-003 QF Issues

SHAWN SMALLWOOD, PH.D.
3108 FINCH ST.
DAVIS, CA 95616-0176
R.04-04-003 QF Issues

MARK J. SMITH
FPL ENERGY
3195 DANVILLE BLVD, STE 201
ALAMO, CA 94507
R.04-04-003 QF Issues

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH STREET, NW, SUITE 800
WASHINGTON, DC 20005
R.04-04-003 QF Issues

ANAN H. SOKKER
LEGAL ASSISTANT
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20036
R.04-04-003 QF Issues

Merideth Sterkel
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

Robert L. Strauss
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

IRENE M. STILLINGS
EXECUTIVE DIRECTOR
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., STE. 100
SAN DIEGO, CA 92123
R.04-04-003 QF Issues

KAREN TERRANOVA
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

BRIAN THEAKER
WILLIAMS POWER COMPANY
3161 KEN DEREK LANE
PLACERVILLE, CA 95667
R.04-04-003 QF Issues

EDWARD J TIEDEMANN
KRONICK MOSKOVITZ TIEDEMANN AND GIRARD
400 CAPITOL MALL
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DOWNEY BRAND, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-4686
R.04-04-003 QF Issues

ANDREW ULMER
CALIFORNIA DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563
R.04-04-003 QF Issues

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.04-04-003 QF Issues

JOY A. WARREN
ATTORNEY AT LAW
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.04-04-003 QF Issues

TORY S. WEBER
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

ROBERT B. WEISENMILLER, PH.D.
MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612-3517
R.04-04-003 QF Issues

ROBERT B. WEISENMILLER
MRW & ASSOCIATES, INC.
1814 FRANKLIN ST. SUITE 720
OAKLAND, CA 94612-3517-3517
R.04-04-003 QF Issues

WILLIAM W. WESTERFIELD III
ELLISON SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

RON WETHERALL
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS 20
SACRAMENTO, CA 96814-5512
R.04-04-003 QF Issues

JOSEPH B. WILLIAMS
MCDERMOTT WILL & EMERGY LLP
600 THIRTEENTH STREET, N.W.
Morgan Stanley Capital Group Inc.
WASHINGTON, D.C. 20005-3096
R.04-04-003 QF Issues

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A
SAN FRANCISCO, CA 94177-0001
R.04-04-003 QF Issues

JAMES WOODRUFF
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-003 QF Issues

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES, INC.
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814
R.04-04-003 QF Issues

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941
R.04-04-003 QF Issues

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899
R.04-04-003 QF Issues

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT
SAN DIEGO, CA 91910
R.04-04-003 QF Issues

Amy C Yip-Kikugawa
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5135
SAN FRANCISCO, CA 94102-3214
R.04-04-003 QF Issues

MICHAEL A. YUFFEE
MCDERMOTT WILL & EMERY LLP
600 THIRTEENTH STREET, N.W.
WASHINGTON, DC 20005-3096
R.04-04-003 QF Issues

ERIC YUSSMAN
REGULATORY ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE, KY 40223
R.04-04-003 QF Issues

CARLO ZORZOLI
ENEL NORTH AMERICA, INC.
1 TECH DRIVE, SUITE 220
ANDOVER, MA 1810
R.04-04-003 QF Issues

CENTRAL FILES
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530
R.04-04-003 QF Issues

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE
SAN FRANCISCO, CA 94110
R.04-04-003 QF Issues

ABBAS M. ABED
ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
402 WEST BROADWAY, SUITE 400
SAN DIEGO, CA 92101
R.04-04-025

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201
R.04-04-025

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-025

GEORGETTA J. BAKER
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC/SOCAL GAS
101 ASH STREET, HQ 13
SAN DIEGO, CA 92101
R.04-04-025

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.04-04-025

Valerie Beck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

TOM BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710
R.04-04-025

SYLVIA BENDER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS22
SACRAMENTO, CA 95814
R.04-04-025

ROGER BERLINER
PRESIDENT
BERLINER LAW PLLC
1747 PENNSYLVANIA AVE. N.W., STE 825
WASHINGTON, DC 20006
R.04-04-025

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, 5TH FLOOR
WALNUT CREEK, CA 94596
R.04-04-025

KAREN BOWEN
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111
R.04-04-025

CAL BROOMHEAD
DEPT OF ENVIRONMENT, ENERGY SECTION
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO, CA 94102
R.04-04-025

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-025

MARGARET D. BROWN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442
R.04-04-025

MARK BRYON
MANAGER, ASSET MANAGEMENT
POWER SYSTEMS
4300 RAILROAD AVENUE
PITTSBURG, CA 94565
R.04-04-025

NINA BUBNOVA
CASE MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.04-04-025

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
R.04-04-025

Susannah Churchill
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

AUDREY CHANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.04-04-025

HOWARD W. CHOY
DIVISION MANAGER
LOS ANGELES COUNTY ISD, FACILITIES OPERA
1100 NORTH EASTERN AVENUE
LOS ANGELES, CA 90063
R.04-04-025

Cheryl Cox
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-04-025

JANET COMBS
LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

BRIAN CRAGG
ATTORNEY AT LAW
GOODIN, MAC BRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.04-04-025

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS, CA 95762
R.04-04-025

REGINA M. DEANGELIS
ATTORNEY AT LAW
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-025

LISA DECARLO
STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-14
SACRAMENTO, CA 95814
R.04-04-025

DANIEL L. DIAL
KINDER MORGAN ENERGY PARTNERS, L.P.
500 DALLAS STREET, SUITE 1000
ONE ALLEN CENTER
HOUSTON, TX 77002
R.04-04-025

Paul Douglas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

Tim G Drew
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

Shannon Eddy
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4102
SAN FRANCISCO, CA 94102-3214
R.04-04-025

RICHARD D. ELY
DAVIS HYDRO
27264 MEADOWBROOK DRIVE
DAVIS, CA 95618
R.04-04-025

RICHARD M. ESTEVES
SESCO, INC.
77 YACHT CLUB DRIVE, SUITE 1000
LAKE HOPATCONG, NJ 7849
R.04-04-025

ANNE FALCON
EES CONSULTING, INC.
570 KIRKLAND AVE
KIRLAND, WA 98033
R.04-04-025

DIANE I. FELLMAN
LAW OFFICE OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.04-04-025

LAW DEPARTMENT FILE ROOM
LAW DEPT FILE ROOM
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 7442
PO BOX 770000 MAILCODE B30A
SAN FRANCISCO, CA 94120-7442
R.04-04-025

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123
R.04-04-025

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.04-04-025

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.04-04-025

Nora Y. Gatchalian
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 3-C
SAN FRANCISCO, CA 94102-3214
R.04-04-025

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.04-04-025

LAURA GENAO
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

RICHARD GERMAIN
NAVIGANT CONSULTING, INC.
ONE MARKET ST. SPEAR ST TOWER, STE 1200
SAN FRANCISCO, CA 94105
R.04-04-025

ROBERT B. GEX
ATTORNEY AT LAW,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
R.04-04-025

DONALD GILLIGAN
ATTORNEY AT LAW
NATIONAL ASSOCIATON OF ENERGY SERVICE
610 MOUNTAIN STREET
SHARON, MA 2067
R.04-04-025

Sudheer Gokhale
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-04-025

STEVEN A. GREENBERG
DISTRIBUTED ENERGY STRATEGIES
4100 ORCHARD CANYON LANE
VACAVILLE, CA 95688
R.04-04-025

JOHN E. GREENHALGH
NEW ERA ENERGY, INC.
PO BOX 121
WILLIAMSBURG, VA 23090-0121
R.04-04-025

STEVEN F. GREENWALD
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
R.04-04-025

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 7450
R.04-04-025

Julie Halligan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 2203
SAN FRANCISCO, CA 94102-3214
R.04-04-025

STEPHEN F. HALL
STEPHEN F. HALL AND ASSOCIATES
11-5651 LACKNER CRESCENT
RICHMOND, BC V7E 6E8
CANADA
R.04-04-025

PETER W. HANSCHEN
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE 450
Agricultural Energy Consumers Assn.
WALNUT CREEK, CA 94596
R.04-04-025

MARK HARRER
56 ST. TIMOTHY CT.
DANVILLE, CA 94526
R.04-04-025

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.04-04-025

Donna J Hines
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4102
SAN FRANCISCO, CA 94102-3214
R.04-04-025

CHRISTOPHER HILEN
ASSISTANT GENERAL COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89511
R.04-04-025

SETH D. HILTON
STOEL RIVES
111 SUTTER ST., SUITE 700
SAN FRANCISSCO, CA 94104
R.04-04-025

JEFF HIRSCH
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO, CA 93012-9243
R.04-04-025

PATRICK HOLLEY
COVANTA ENERGY CORPORATION
2829 CHILDRESS DR
ANDERSON, CA 96007-3563
R.04-04-025

PHILIP HOOVER
H & M ENGINEERING, INC.
4521 ALPINE ROSE BEND
ELLICOTT CITY, MD 21042
R.04-04-025

MARK R. HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
R.04-04-025

JOEL M. HVIDSTEN
KINDER MORGAN ENERGY PARTNERS
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868
R.04-04-025

ERIC J. ISKEN
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-500
SACRAMENTO, CA 95814
R.04-04-025

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.04-04-025

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-025

JOSEPH M. KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111-5802
R.04-04-025

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
R.04-04-025

ANN KELLY
DEPARTMENT OF THE ENVIRONMENT
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO, CA 94102
R.04-04-025

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814
R.04-04-025

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-025

Robert Kinosian
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4205
SAN FRANCISCO, CA 94102-3214
R.04-04-025

CHRIS KING
CALIFORNIA CONSUMER EMPOWERMENT
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
R.04-04-025

JOSEPH KLOBERDANZ
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123
R.04-04-025

ROBERT L. KNIGHT
BEVILACQUA-KNIGHT INC
1000 BROADWAY, SUITE 410
OAKLAND, CA 94607
R.04-04-025

MARC KOLB
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B918
SAN FRANCISCO, CA 94105
R.04-04-025

SUZANNE KOROSEC
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
MS-45
SACRAMENTO, CA 95184
R.04-04-025

EDWARD V. KURZ
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
R.04-04-025

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, RM. 996B
SAN FRANCISCO, CA 94105
R.04-04-025

PETER LAI
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
R.04-04-025

RICHARD LAUCKHART
HENWOOD ENERGY SERVICES, INC.
2379 GATEWAY OAKS DRIVE, SUITE 200
SACRAMENTO, CA 95833
R.04-04-025

Diana L. Lee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
R.04-04-025

STEVEN A. LEFTON
VP POWER PLANT PROJECTS
APTECH ENGINEERING SERVICES INC.
PO BOX 3440
SUNNYVALE, CA 94089-3440
R.04-04-025

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.04-04-025

Steve Linsey
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 2013
SAN FRANCISCO, CA 94102-3214
R.04-04-025

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.04-04-025

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
ANTELOPE, CA 95843
R.04-04-025

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.04-04-025

BARRY LOVELL
BERRY PETROLEUM COMPANY
5201 TRUXTUN AVE., SUITE 300
BAKERSFIED, CA 93309
R.04-04-025

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105
R.04-04-025

ANDREW B. MAKLER
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
R.04-04-025

WILLIAM B. MARCUS
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95608
R.04-04-025

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060
R.04-04-025

Wade McCartney
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814
R.04-04-025

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616
R.04-04-025

LIZBETH MCDANNEL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD, CA 91770
R.04-04-025

PATRICK MCDONNELL
AGLAND ENERGY SERVICES, INC.
2000 NICASIO VALLEY RD.
NICASIO, CA 94946
R.04-04-025

SCOTT MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814
R.04-04-025

RACHEL MCMAHON
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814
R.04-04-025

TANDY MCMANNES
SOLAR THERMAL ELECTRIC ALLIANCE
101 OCEAN BLUFFS BLVD.APT.504
JUPITER, FL 33477-7362
R.04-04-025

KEVIN R. MCSPADDEN
ATTORNEY AT LAW
MILBANK,TWEED,HADLEY&MCCLOY LLP
601 SOUTH FIGUEROA STREET, 30TH
FLOOR
LOS ANGELES, CA 90068
R.04-04-025

Ariana Merlino
CALIF PUBLIC UTILITIES COMMISSION
1350 FRONT ST., STATE BLDG. ROOM 4006
AREA 4-A
SAN DIEGO, CA 92101
R.04-04-025

BRADLEY MEISTER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-26
SACRAMENTO, CA 95814
R.04-04-025

MICHAEL MESSENGER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814
R.04-04-025

MARY ANN MILLER
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 96814-5512
R.04-04-025

CYNTHIA K. MITCHELL
530 COLGATE COURT
RENO, NV 89503
R.04-04-025

Joy Morgenstern
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.04-04-025

CLYDE MURLEY
CONSULTANT
600 SAN CARLOS AVENUE
ALBANY, CA 94706
R.04-04-025

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.04-04-025

CYRSTAL NEEDHAM
SENIOR DIRECTOR, COUNSEL
EDISON MISSION ENERGY
18101 VON KARMAN AVENUE
IRVINE, CA 92612-1046
R.04-04-025

Noel Obiora
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-025

REN ORENS
ENERGY AND ENVIRONMENTAL
ECONOMICS
353 SACRAMENTO ST., STE 1700
SAN FRANCISCO, CA 94111
R.04-04-025

Karen P Paull
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
R.04-04-025

Lisa Paulo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

BERJ K. PARSEGHIAN
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

STEVEN D. PATRICK
ATTORNEY AT LAW
SOUTHERN CALIFORNIA GAS/SDG&E
555 WEST 5TH STREET, GT14E7
LOS ANGELES, CA 90013-1034
R.04-04-025

Marion Peleo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.04-04-025

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.04-04-025

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS, CA 94024
R.04-04-025

TED POPE
DIRECTOR
COHEN VENTURES, INC./ENERGY
SOLUTIONS
1738 EXCELSIOR AVENUE
OAKLAND, CA 94602
R.04-04-025

SNULLER PRICE
ENERGY AND ENVIRONMENTAL
ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104
R.04-04-025

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
R.04-04-025

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062
R.04-04-025

DAVID REYNOLDS
ASPEN SYSTEMS CORPORATION
5802 BALFOR ROAD
ROCKLIN, CA 95765
R.04-04-025

LAURA ROOKE
SR. PROJECT MANAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND, OR 97204
R.04-04-025

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.04-04-025

KATHERINE RYZHAYA
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.04-04-025

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.04-04-025

DAVID SAUL
COO
SOLEL, INC.
701 NORTH GREEN VALLEY PKY, STE 200
HENDERSON, NV 89074
R.04-04-025

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714
R.04-04-025

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660
R.04-04-025

ROBERT SHAPIRO
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20036
R.04-04-025

JENNIFER SHIGEKAWA
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 7450
R.04-04-025

CARL SILSBEE
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

JUNE M. SKILLMAN
CONSULTANT
2010 GREENLEAF STREET
SANTA ANA, CA 92706
R.04-04-025

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH STREET, NW, SUITE 800
WASHINGTON, DC 20005
R.04-04-025

ANAN H. SOKKER
LEGAL ASSISTANT
CHADBOURNE & PARKE LLP
1200 NEW HAMPSHIRE AVE. NW
WASHINGTON, DC 20036
R.04-04-025

JEANNE M. SOLE
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO, CA 94102
R.04-04-025

SEEMA SRINIVASAN
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.04-04-025

Merideth Sterkel
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

Robert L. Strauss
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

JOHN SUGAR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 42
SACRAMENTO, CA 95814
R.04-04-025

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.04-04-025

Jeorge S Tagnipes
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ENERGY DIVISION AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.04-04-025

Christine S Tam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.04-04-025

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.04-04-025

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, SUITE 210
WALNUT CREEK, CA 94597
R.04-04-025

EDWARD J TIEDEMANN
KRONICK MOSKOVITZ TIEDEMANN AND GIRARD
400 CAPITOL MALL
SACRAMENTO, CA 95814
R.04-04-025

NANCY TRONAAS
CALIFORNIA ENERGY COMMISSION
1516 9TH ST. MS-20
SACRAMENTO, CA 95814-5512
R.04-04-025

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DOWNEY BRAND, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-4686
R.04-04-025

ANDREW ULMER
CALIFORNIA DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET
SACRAMENTO, CA 95814
R.04-04-025

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016
R.04-04-025

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.04-04-025

JOY A. WARREN
ATTORNEY AT LAW
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.04-04-025

TORY S. WEBER
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.04-04-025

WILLIAM W. WESTERFIELD III
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS L.L.P.
2015 H STREET
SACRAMENTO, CA 95814
R.04-04-025

JANET WHITTICK
BUSINESS ENERGY COALITION
PO BOX 770000
SAN FRANCISCO, CA 94177
R.04-04-025

MICHAEL J. WICKENDEN
CONTACT ADMINISTRATOR
VERMONT ENERGY EFFICIENCY UTILITY
446 TENNEY HILL ROAD
HYDE PARK, VT 5655
R.04-04-025

BEN WILDMAN
SBW CONSULTING, INC.
2820 NORTHUP WAY, SUITE 230
BELLEVUE, WA 98004-1419
R.04-04-025

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A
SAN FRANCISCO, CA 94177-0001
R.04-04-025

JAMES WOODRUFF
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.04-04-025

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES, INC.
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814
R.04-04-025

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941
R.04-04-025

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY
DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899
R.04-04-025

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT
SAN DIEGO, CA 91910
R.04-04-025

Amy C Yip-Kikugawa
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5135
SAN FRANCISCO, CA 94102-3214
R.04-04-025

ERIC YUSSMAN
REGULATORY ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE, KY 40223
R.04-04-025

CARLO ZORZOLI
ENEL NORTH AMERICA, INC.
1 TECH DRIVE, SUITE 220
ANDOVER, MA 1810
R.04-04-025

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.04-04-025

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431
R.04-04-025